

ORR Matching Grant CY 2005 Program Guidelines

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ORR Matching Grant

CY 2005 Program Guidelines

The purpose of the Matching Grant Program is to help eligible clients attain self-sufficiency within 120 to 180 days after date of eligibility for Matching Grant services, without accessing public cash assistance. Competition is limited. Only agencies which have an ongoing relationship with the refugees and/or Cuban and Haitian entrants that has been established as a result of providing reception and placement services under the terms of a Cooperative Agreement with the Department of State or the Department of Homeland Security are eligible to apply.

The Matching Grant program's goal is to help refugees, certain Amerasians, Cuban and Haitian entrants, asylees, and certified victims of trafficking attain economic self-sufficiency within 120 to 180 days after date of eligibility for the program without accessing public assistance. Participating agencies agree to match the Office of Refugee Resettlement (ORR) grant with cash and in-kind contributions of goods and services from the community.

Program Services

Services must be provided to the maximum extent feasible in a manner that is culturally and linguistically compatible with a client's language and cultural background. In particular, grantees must ensure that language assistance is provided to Limited English Proficient clients in accordance with Health and Human Services guidance. Services listed under section I. below, must be provided in-house. Services under section II. below, may be provided through coordinated efforts of mainstream service providers.

The Matching Grant program core maintenance services, which are provision of food, housing, cash allowance and transportation assistance, must be provided by the grantee to eligible clients or family units (cases) through funds authorized by the Matching Grant for a minimum of 90 days from the date of enrollment, not to end prior to the individual's 120th day from date of eligibility, unless the client voluntarily leaves the program or becomes economically self-sufficient, as defined at 45 C.F.R. 400.2. Matching Grant core maintenance services may continue for an additional 60 days as necessary as long as costs charged for Federal

reimbursement remain within allowable limits, as specified below, and as long as the refugee is not enrolled in another non-Matching Grant employment program and is not receiving public cash assistance. In this context, “as necessary” means that the client or family unit has not achieved economic self-sufficiency, as defined at 45 C.F.R. 400.2. Case management and employment services must continue through the 180th day from date of eligibility, unless the client voluntarily leaves the program.

If a client accesses public assistance, the client is effectively withdrawing from the Matching Grant program. All cash allowances, services and in-kind contributions afforded by the Matching Grant program should cease. For reporting purposes, the client has dropped out of the program and accessed cash assistance. Clients accessing public assistance should be referred to mainstream refugee programs.

II. REQUIRED SERVICES THAT AGENCIES MUST PROVIDE IN-HOUSE:

1. Case Management

Objective: To ensure that services are provided in a planned, effective, and timely manner to eligible clients; are appropriate to the needs of the clients; and contribute to their early employment and self-sufficiency. Case Management shall commence immediately upon enrollment and continue through the 180th day. Services should support and strengthen clients’ motivation and capacities to become self-supporting. From the first client contact, agency interaction with the client shall reinforce his/her motivation and ability to become self-supporting.

A case file shall be maintained which includes:

- a. Intake information (date of arrival, number and names of members of the case upon arrival; and, for those in the Matching Grant, documentation showing the individual is eligible for services (see 45 CFR 400.43 and ORR State Letters #00-17, #00-22, #01-13 and #02-01), alien number, birth date, current address, health status, educational level, native language, literacy and English language level on arrival, prior work experience and skills, and social security number when obtained);

- b. Signed and dated Matching Grant enrollment form and letter of Client Rights and Responsibilities.
- c. A resettlement plan (steps and projected time frames to be taken by the client, his/her family, and the agency to work toward the earliest possible employment and self-sufficiency for the family including strategies to remove any barriers to self-sufficiency, amount of earnings necessary to be self-sufficient);
- d. Clear documentation of all services provided to clients based upon the needs and goals identified in the resettlement services plan. If a client is enrolled in a training program, the date, type, intended duration, expected outcomes, and provider of the training program also should be indicated in the case file;
- e. Documentation of regular contact with, and monitoring progress of, adult members of the case over time with summary notes regarding the purpose and outcomes of that contact, coupled with c. above;
- f. A statement regarding the status of the case at 120 and 180 days after date of eligibility, e.g., whether the employable refugees are employed, number of hours per week, at what wages, place(s) of employment, employer contact information, whether or not health benefits are available within 180 days of placement, self-sufficiency status due to earnings, referred to welfare, etc. This status statement should be located in a designated place in all case files, easily found, and not randomly stated within the case notes.
- g. Documentation of the provision of childcare and after school care, if needed.
- h. Proposed budget for the respective case with actual expenditures to date. All cash transactions are to be clearly documented and initialed by an adult member of the client family. Each file is to have a summary sheet of all cash and in-kind contributions allocable to the Matching Grant program.
- i. When maintenance support and/or services are extended beyond the minimum 120-day core maintenance period, files should note when the support and/or services are terminated
- j. Matching Grant file documentation must be separate from services provided to refugees through other programs and the cooperative agreement. Separation by sectioning Matching Grant from other services in combined files is acceptable.

2. Employment Services

Objective: To place employable clients as quickly as possible into appropriate jobs which will enable the refugee household unit to become self-sufficient within 120-180 days. Employment services are to be provided to employable adult refugees starting upon enrollment in the Matching Grant program and continuing as needed through the 180th day. Federal policy requires that, if necessary, clients accept “entry level” employment (see 45 CFR 400.81(a) for criteria for appropriate employment). Grantees shall communicate to employable clients who lack English language competency that they must exert a good faith effort to obtain employment while acquiring the competency in English to facilitate self-sufficiency and retain employment. Agencies shall continue to look for suitable work with clients through job upgrades where appropriate.

A local Matching Grant agency may sanction a client who fails to comply with an agreed-upon resettlement plan and/or agency directive involving attendance at counseling, training sessions, or English classes or who refuses to be interviewed for or accept an appropriate job offer. In situations where sanctions are to be applied, procedures must be in place to ensure that clients receive adequate written notice detailing the reasons for the intended action and an opportunity for an adequate hearing before termination of benefits. (See Goldberg v. Kelly, 397 U.S. 254 (1970); see, e.g., 45 C.F.R. 400.54 and 400.82) Limited sanctions may be imposed in order to attempt to gain compliance, through the reduction or withholding of maintenance assistance or other services. If the client continues to fail to comply, the agency, after due process, may fully sanction the client from the Matching Grant Program. Such sanctioning may include the cessation of maintenance assistance and all services charged to the Matching Grant Program.

Grantees shall attempt to find employment for all employable members of the family unit when requested and/or is necessary to have more than one wage earner employed in order for the family to be economically self-sufficient.

Employment services to be provided are:

- a. Job development: an ongoing process of networking with employers to develop prospective job openings for MG clients.
- b. Job counseling: ongoing interaction between the client and the person responsible for job development regarding questions and concerns that clients have about the world of work, job search, the need for early employment, job retention, and the consequences of refusing an appropriate offer of employment.
- c. Direct job placement assistance: assisting the client to identify and contact prospective places of employment, scheduling appointments for job interviews, preparing clients for interviews, and following up on results of interviews. Each locale must have a staff person who is responsible for providing or overseeing provision of these services to assist clients to become employed. This person may receive assistance from sponsors and volunteers in locating employment.
- d. Follow-up with employer and employed clients: Contacting the employer (if the agency or the agency's volunteer has found the job placement) and contacting the employed clients (regardless of whether the agency or the client has found the job placement) within two weeks after the client has started work to identify any adjustment problems and to assist in the resolution of those problems. Such follow-up activities must occur throughout the first 180 days from date of eligibility. The responsibility for placement and follow-up of Matching Grant clients resides with the Matching Grant staff. Job developers funded by other sources may share information on job availability with Matching Grant staff and vice versa, but the actual conduct of the above services for Matching Grant clients must be done by the staff of the Matching Grant agency under the Matching Grant funding.
- e. Services that lead to job upgrades for clients with particular skills, vocations, or when necessary in order for the client family to achieve economic self-sufficiency.
- f. Subsidized employment may be used to gain entry into the job market; however employment outcomes are only counted when the subsidy ends and the client retains employment; the transition to a non-subsidized job must be completed by the 180th day.

3. Maintenance Assistance and Cash Allowance

Objective: To provide support adequate to meet the subsistence needs of the refugee and to preclude the need to access public cash assistance. Maintenance assistance includes provision of food or food subsidies, suitable housing, cash allowance and transportation assistance, throughout the first 120 days from the client's date of eligibility. Agencies may elect to provide maintenance assistance to clients, if necessary for an additional 60 days, provided that the grantee's total grant budget and the amount charged to the grant do not exceed the grant award. "If necessary" means that the individual has not attained economic self-sufficiency, as defined at 45 C.F.R. 400.2, and has not left the program.

This assistance is available to enhance and extend, but not supplant nor duplicate, assistance provided for under any Reception and Placement Cooperative Agreement. Food, housing, essential furnishings, and transportation to and from job interviews and job training is usually provided through a Cooperative Agreement with non-Matching Grant funding during the first thirty days of the refugees' stay in the United States. In cases where such support is available, Matching Grant funds would not be needed to provide these items or services during the first 30 days and such costs should not be charged to the Matching Grant program. It is expected that the two programs where they coexist, should provide, if necessary, a minimum of four consecutive months of maintenance support for the refugee case. "If necessary" means that the individual has not attained self-sufficiency and has not left the Matching Grant program. For Matching Grant clients that arrive without the benefit of R&P services, i.e., certain Cuban/Haitian entrants, victims of severe forms of trafficking and asylees, these services (such as referral to health screening, enrollment of children in school, orientation, etc.) are to be provided. All such services and in-kind contributions are allocable to the Matching Grant program for these clients.

For clients who need housing as a part of maintenance, rent payments shall continue at a minimum for the month following job placement up to the 120th day. Agencies may elect to provide housing assistance to clients for an additional 60 days, if necessary, provided that the grantee's total grant budget and the amount charged to the grant do not exceed

the grant award. Resettlement agencies are reminded to pay particular attention to placing clients in housing that is near employment and/or where public transportation to employment areas is readily available.

Beginning upon enrollment and continuing until income from employment shall render the case self-sufficient, agencies must provide a minimum of \$200 cash allowance per month (\$50 per week), or the maximum amount that will not affect Medicaid eligibility, to all adult clients, and \$40 per month (\$10 per week) to each minor in the case. This minimum cash allowance should be used by clients to buy personal items as necessary and not for basic maintenance assistance. Local resettlement agencies may provide some of the weekly allowance in the form of vouchers if such form of payment is in the overall best interest of the refugee and he/she concurs. Agencies may opt to withhold a portion of the minor's allowance until the end of the MG service period to build up a family's savings, provided that the monthly allowance is sufficient to buy personal items as necessary, that such savings will not affect Medicaid eligibility, and that client has fully complied to these terms in writing. Agencies are not required to pay the \$50/week/adult and \$10/week/minor from Matching Grant funds if enrolling refugees concurrently during R&P period or Cubans/Haitian entrants receiving services from the Department of Homeland Security Cuban/Haitian Program. Cash allowances for these clients must begin upon conclusion of the R&P or C/H 30-day period.

4. Administration

Objective: To ensure planned, coordinated, timely, and appropriate delivery of services and adherence to Federal regulations, policies, and guidelines. Matching Grant grantees and their affiliates are responsible for ensuring that administrative functions relating to reception and placement activities (e.g., coordination of refugee arrivals into the United States, placement, placement activities, and core services) are allocated appropriately to available Cooperative Agreement grants.

Grantee Administrators shall:

- a. Plan and coordinate program services with other local service providers in the community. Local Matching Grant affiliates must notify all Matching Grant agencies in the community of enrollment of any Cuban and Haitian entrant, victim of severe forms of trafficking, or asylee that arrives without the benefit of a Reception and Placement grant to assure non-duplication of enrollment in the Matching Grant program.
- b. Provide technical assistance and training to local offices regarding the Matching Grant program's administrative, reporting, and other grant requirements.
- c. Monitor the performance of the grant and sub-grant activities and review each program function to assure that adequate progress is being made towards achieving programmatic goals and compliance with Federal grant regulations.
- d. Monitoring reports, including any corrective actions recommended and follow-up on those recommendations, shall be filed at the grantee's national office.
- e. Manage grant finances and account for funds according to Federal grant requirements.
- f. Submit timely programmatic and financial reports and the annual goal plan to ORR.
- g. Obtain prior approval from ORR before making any significant changes (defined as a 10 percent change, up or down) in the number of clients enrolled in the Matching Grant Program at any given site and before adding any new sites.
- h. Work with their local affiliates and offices to develop policies in the context of the Federal Food Stamp requirements to assure clients meet the eligibility requirements for the Food Stamp program. [See ORR State Letter 97-28]. ORR recognizes that weekly cash payments may make certain refugee cases ineligible for Food Stamps. Local resettlement agencies may provide some of the weekly allowance in the form of vouchers if such form of payment is in the overall best interest of the refugee and he/she concurs.
- i. Work with their local affiliates and offices to assure that weekly cash payments are made to the maximum extent possible without rendering the refugee ineligible for Medicaid. Local resettlement agencies may provide some of the weekly allowance in the form of vouchers if such form of payment is in the overall best interest of the refugee and he/she concurs.

- j. In situations where sanctions are to be applied, procedures must be in place to ensure that clients receive adequate written notice detailing the reasons for the intended action and an opportunity for an adequate hearing before termination of benefits (see *Goldberg v. Kelly*, 397 U.S. 254 (1970); see, e.g., 45 CFR 400.54 and 400.82).
- k. Facilitate the transition to other ORR and mainstream programs at the end of the Matching Grant services.

III. COMPONENTS FOR WHICH AGENCIES MAY ARRANGE FOR PROVISION OUTSIDE OF THE AGENCY:

Grantees shall provide the services listed below, as necessary, directly through the Matching Grant Program or through referral to other programs. Agencies are encouraged to develop special programs, which take into account client characteristics and the agency's experience.

1. English Language Training (ELT)

- a. Provide or assist clients in enrolling in an English language training class, as needed, according to competency level and previous English language training identified in the resettlement plan. English language training must be concurrent with rather than sequential to employment services. English language training is to be provided without cost to the client.
- b. English language training classes shall be certified or be otherwise taught by trained ELT instructors.
- c. Classes shall be scheduled so as not to inhibit employment search and employment; i.e., evening classes are recommended where possible. Classes should be geared toward early employment and self-sufficiency to the extent possible.
- d. Agencies are required to document attendance and progress of the client when ELT is indicated as an essential part of the resettlement plan for employment.
- e. Grantees shall inform clients that non-participation without good cause in ELT, where ELT is indicated as essential in a resettlement plan for employment, may be considered grounds for sanctioning or termination of maintenance assistance.
- f. Grantees shall take reasonable measures to ensure that tutoring support services provided by volunteers are coordinated with the English Language Training curriculum and are provided in response to the needs indicated in the resettlement

plan. Volunteers should be provided program orientation and ongoing guidance to assist in effective service delivery.

2. Health and Medical Services

- a. Agencies shall assist clients in attaining access necessary health and medical services including health screenings. These costs are normally covered under Cooperative Agreements. For clients who do not receive such services under a Cooperative Agreement, these costs are allocable to the Matching Grant program.
- b. Agencies should enroll Matching Grant clients in Medicaid or Refugee Medical Assistance (RMA), and make every effort to ensure that the client's need for medical assistance does not result in receipt of public cash assistance.
- c. Also 45 CFR 400.104(a) states that "[i]f a refugee who is receiving medical assistance receives earnings from employment, the earnings shall not affect the refugee's continued medical assistance eligibility." Section 400.104(b) provides that "[i]f a refugee, who is receiving Medicaid and has been residing in the U.S. less than the time-eligibility period for refugee medical assistance, becomes ineligible for Medicaid because of earnings from employment, the refugee must be transferred to refugee medical assistance without an RMA eligibility determination." Section 400.104 (c) further provides that the refugee shall continue to receive medical assistance until he/she reaches the end of his or her time-eligibility period for refugee medical assistance. Finally, section 400.104(d) provides that "in cases where a refugee is covered by employer-provided health insurance, any payment of RMA for that individual must be reduced by the amount of the third party payment."

3. Employment Training or Recertification

- a. Provide, or assist clients in enrolling in, short-term job training, customized skills training, or job recertification courses, if indicated in the resettlement plan. Such training is allowed if it is expected to lead to self-sufficiency within the first 120-180 days of eligibility.
- b. Non-Matching Grant funded On-the-Job Training (OJT) may be used only when suitable employment is not obtainable without the OJT or for the purpose of job upgrading. Agencies are expected to find the placement and monitor the client's progress. Follow-up on placements continues to be the responsibility of the Matching Grant agency. Job placement is counted from the time the job is no longer subsidized.
- c. Specialized or customized skill training is an allowable employment service activity where there is a short-term training program available for Matching Grant client with specific skills and for whom the training will lead to self-sufficiency for the case within the first 120-180 days from date of eligibility. Such costs as tuition, books and related support services are allowable and allocable to the Matching Grant program when not otherwise available under other programs. Subsidized employment may be used to gain entry into the job market; however employment outcomes are only counted when the subsidy ends and the client retains employment.

4. Social Adjustment Services

- a. Provide or assist clients in obtaining social adjustment services, such as counseling and interpretation services, when necessary.

5. Support Services

- a. Provide, or assist clients in obtaining childcare (day care and after school care), and address transportation problems that are barriers to self-sufficiency.

IV. COORDINATION

The Matching Grant program is part of the overall resettlement program in the State. Therefore, grantees shall require that local affiliates which participate in the program inform the relevant State Refugee Coordinator of the agency's participation in the Matching Grant Program. The following written information must be provided to the State Refugee Coordinator within 90 days following the grant and continuation award date, with a copy sent to the Office of Refugee Resettlement as an attachment to the first program progress report: a copy of the local Matching Grant service plan that includes the number of refugees expected to participate in the program during the grant period, the services to be provided, and the name of the program contact person. State Refugee Coordinators should be engaged in consultation with the Matching Grant program on an on-going basis. This means participation by all local affiliates in all State convened local task forces and consultations to assure that there is an accurate assessment of needs and services in the community.

Affiliates should also provide the State Refugee Coordinator with the following information in order to have their State population estimate adjusted to include those asylees whose asylum was granted within the 36 month period ending September 30: 1) alien number, 2) date of birth, and, 3) the date asylum was granted.

Grantees shall require that local affiliates which participate in the program coordinate, as appropriate, with local welfare offices. This includes prompt response to welfare office questions concerning the level and duration of assistance provided to each refugee.

V. POLICIES RELATING TO COST ALLOCATION AND AGENCY MATCH

Under the Matching Grant program, ORR awards \$2 for every \$1 raised by the agency up to a maximum of \$2,000 in federal funds per client. Of this match, Volags and local affiliates must provide at least 20 percent of the match in cash; the balance may be cash, in-kind services, or donated goods. Agencies may count in-kind contributions provided directly to a particular

Matching Grant client up to and including the 180th day as long as that client remains in the program at the time of the contribution.

The following policies are applicable to allowable cost and required agency match:

1. All costs incurred and allocable and services provided in accordance with any Cooperative Agreement may not be charged to the Matching Grant program or counted as a matching contribution.
2. All goods and services must be allowable, reasonable and allocable to the Matching Grant, whether paid for by Federal funds, by agency match or in-kind contributions. One guide agencies should use in considering in-kind contributions is whether such goods or services attributed to the match would have been purchased if they had not been contributed.
3. Volunteer staff services may be computed using an average hourly rate for all non-professional support or a menu of volunteer rates. Check www.independentsector.org for applicable rates. These rates will then be proposed to the national agencies for review and included in the Matching Grant application. ORR may negotiate rates prior to issuing awards.
4. Each agency/affiliate must have a standard way of tracking and documenting volunteer time. Documentation of volunteer time via email is acceptable as long as such reports are submitted in timely fashion and reviewed and approved by the case manager or other specified staff
5. Contributions of goods and services are considered “cash” if the item was paid for. The flow of these donations does not necessarily have to go physically from the donor (i.e., agency) to the donee (i.e., client). If the voluntary agency, or the sponsor, pays for the item with non-federal funds and gives it directly to the client or the client benefits directly from it, it may be considered a cash donation.
6. Goods and services must be directly related to the self-sufficiency plan of the case and be provided by the local affiliate or sponsor to the client. Incidental goods obtained by the client or activities not related to the Matching Grant program or the self-sufficiency plan (such as trips to the park, movies, etc.) are not allocable.
7. When relatives of Matching Grant clients provide housing in their own residence during the match period, this housing cannot be counted as a matching expenditure. However, if the

cost for a relative's residence (including utilities) increases as a direct result of housing Matching Grant clients, then only the amount of the increase may be counted as an in-kind match expenditure. Agencies are required to obtain appropriate documentation (i.e., an appropriately dated letter from a landlord documenting the increase and/or a history of utility bills) to verify that an increase in the cost for the relative's housing has taken place as a result of the addition of the Matching Grant client to the housing unit.

8. If medical services are performed by private doctors and hospitals claiming reimbursement for such services under Medicaid or Refugee Medical Assistance, additional fees above the Medicaid reimbursement level may not be counted as a matching contribution.
9. Staff costs for time spent on services (including the allocable portion of overhead and facilities costs) provided for under the Cooperative Agreement may not be charged to the Matching Grant Program. These costs include staff and volunteer time spent on housing-related matters, medical orientation and referral for initial health screening, assistance in obtaining a social security card, initial intake and development of a resettlement plan, greeting refugees at the airport, and household goods and furniture during the first month. It also includes casework staff costs associated with the requirements of the Cooperative Agreement. Where such services are provided to clients without benefit of the R&P services, such costs are allocable to the Matching Grant program.
10. Costs for refugee baggage transfers or shipments are not allowable under this grant.
11. Initial health screening referrals and orientation, as described in the Cooperative Agreement, are not considered a Matching Grant activity and thus expenses for such activities are not allowable. Such costs however, are allowable for certain Cuban and Haitian entrants, victims of severe forms of trafficking and asylees who do not receive such services under a Cooperative Agreement.
12. Community orientation, as described in the Cooperative Agreement, may not be considered social adjustment services, and is not an allowable activity under the Matching Grant program except for certain Cuban and Haitian entrants, victims of severe forms of trafficking and asylees who do not receive such services under a Cooperative Agreement.
13. Elementary, secondary and other school tuition for children is not considered within the scope of the Matching Grant Program and thus is not an allowable service under this section. However, childcare costs and day camps for children of newly employed parents or

those in employment-related training are allowable where reasonable and necessary. These costs are allowable for up to 180 days after arrival or until the case accesses public cash assistance, whichever occurs first.

14. Due to the Matching Grant's unique statutory requirements, voluntary contributions are not considered program income. Any income directly generated by a Matching Grant-supported activity, however, is to be considered program income. Such program income may be used for allowable costs of the program to meet the Federal match requirements. Program income used as match should be reported on line 10. g of Standard Form 269. For example, if a video is produced using Matching Grant funds and copies are subsequently sold, any profit would be considered program income. (Note: Prior permission from ORR through either the application process or by special request would be needed to produce a video with Matching Grant funds.) Furthermore, if grantees require fees in exchange for the sponsorship of refugees who may be placed in the Matching Grant Program as a condition for the sponsoring of a particular individual, such funds are considered program income and must be reported.
15. Grantees must be able to provide at least 33 percent of the total approved cost of the project. The total approved cost of the project is the sum of the ACF share and the non-federal share. The non-Federal share may be met by cash or in-kind contributions, although applicants are encouraged to meet their match through cash contributions. Therefore, a project requesting \$200,000 in Federal funds must provide a match of at least \$100,000 (33 percent of total approved project costs \$300,000.) Grantees will be held accountable for commitments of non-Federal resources even if over the amount of the required match. Failure to provide the amount will result in disallowance of Federal Match.